

The Parties have been engaged in informal discussions regarding the parameters for settlement negotiations. Plaintiffs submitted a written settlement demand on November 20, 2017. Defendant is in the process of reviewing this settlement demand and will provide a response to Plaintiffs on or before January 16, 2018.

As of the date of this Joint ADR Report, the Parties have not reached settlement. The Parties are in the process of collecting documents and information that will be critical to an effective and productive settlement negotiation.

Appropriateness of Alternative Dispute Resolution

The Parties believe that this matter may be suitable for private mediation if informal settlement negotiations are not successful. The Parties have not yet selected a mediator for such purpose.

Date: January 10, 2018

Respectfully submitted,

By: /s/ Clif Alexander

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2018, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ *Clif Alexander*
Clif Alexander